

January 12, 2000

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth St., SW  
Washington DC 20554



**Re: *Ex Parte* presentation in MM Docket 99-25**

Dear Ms. Salas:

Yesterday, I met with Commissioner Ness and her advisor David Goodfriend to discuss low power radio ("LPFM") on behalf of United Church of Christ ("UCC"), *et al.*

I explained to the Commissioner and Mr. Goodfriend that UCC *et al.*'s technical analysis demonstrated significant flaws in the studies criticizing the technical feasibility of LPFM. For example, one-half of the radios the NAB tested did not meet their standard of technical performance, *before* any interference was introduced. I explained that the NAB's recent response, filed at the FCC on January 5, 2000, to UCC *et al.*'s technical analysis did not find any flaws in UCC *et al.*'s analysis. I provided a copy of the NAB's analysis and a written response to the NAB filing, a copy of which is attached.

In addition, I explained that neither proponent of digital radio had objected to a relaxation of third adjacent protection. In its comments, USADR objected to relaxing second adjacent protection only with respect to interference *outside* its protected contour. Lucent Digital Radio stated in its reply comments that it did not oppose relaxation of second adjacent protection as long as LPFM is a secondary service.

I discussed the need for a clear and easy-to-follow licensing application procedure to assist small non-profits, such as churches, in applying for LPFM licenses. I emphasized the need for advance publication of any application form, for lengthy filing windows, and for significant advance warning for the opening of window periods.

Pursuant to Section 1.1206(b), 47 C.F.R. §1.1206, this letter and attachment are being filed electronically today.

Sincerely,

Cheryl A. Leanza  
Deputy Director

Attachment  
cc: Commissioner Ness

David Goodfriend